

# EXHIBIT C

[Exhibits With Proposed Redactions]

# **EXHIBIT 4**

1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF CALIFORNIA  
3 SAN JOSE DIVISION  
4

5 IN RE: HIGH-TECH EMPLOYEE )  
6 ANTITRUST LITIGATION )  
7 ) No. 11-CV-2509-LHK  
8 THIS DOCUMENT RELATES TO: )  
9 ALL ACTIONS. )

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12 DEPOSITION OF 30(b)(6) WITNESS: ADOBE  
13 (DONNA MORRIS)

14 HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

15 August 21, 2012

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17 Reported by: Anne Torreano, CSR No. 10520

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10:05:37 1 business e-mails?

10:05:38 2 A. My personal e-mail account?

10:05:41 3 Q. When you said you searched your e-mails, what  
10:05:43 4 did you search? You searched e-mails that weren't on a  
10:05:48 5 shared drive?

10:05:49 6 A. So all of my e-mails are just company  
10:05:51 7 e-mails. All of them are recoverable. They're all  
10:05:54 8 company e-mail.

10:05:55 9 Q. Okay. All right.

10:05:56 10 A. So they're on a backup.

10:05:57 11 Q. How did you search? What did you do?

10:05:59 12 A. So I searched by name and searched by -- I  
10:06:05 13 have folders, so I was able to look in different  
10:06:08 14 folders.

10:06:09 15 Q. Okay. So you looked in particular folders.

10:06:11 16 Did you have a folder about the agreement that  
10:06:13 17 Adobe had with Apple?

10:06:14 18 A. No.

10:06:14 19 Q. How did you -- what kind of folders did you  
10:06:17 20 look in to see whether there were relevant e-mails?

10:06:20 21 A. Just general talent folders. So each of the  
10:06:24 22 functional areas I have a folder, so -- I also knew  
10:06:28 23 there weren't too many e-mails that were related to the  
10:06:30 24 situation, so it wasn't too difficult for me to figure  
10:06:36 25 out what documents I had. So it wasn't like I knew

10:06:39 1 that there was all kinds of documents that I had to  
10:06:41 2 search for.

10:06:42 3 Q. How did you know that there was a limited set  
10:06:44 4 of e-mails related to this situation?

10:06:46 5 A. Because it was historical, you know, back to  
10:06:49 6 when Bruce was CEO and discussions that he had had at  
10:06:53 7 that point in time with Steve Jobs, and he made me  
10:06:57 8 aware of it. And I think when an executive makes you  
10:07:01 9 aware of something, you don't need to continue to have  
10:07:03 10 discussions beyond that.

10:07:04 11 Q. What does that mean?

10:07:05 12 A. He was very specific about what we could and  
10:07:08 13 could not do, and it was fair game in terms of our  
10:07:13 14 ability to attract talent from Apple, and he just  
10:07:19 15 specifically asked that we not call directly into  
10:07:23 16 Apple, but certainly, if we met Apple employees along  
10:07:27 17 the way or if Apple employees were qualified for  
10:07:33 18 openings, we could certainly go ahead and recruit.

10:07:37 19 Q. And Mr. Chizen said that the rules regarding  
10:07:41 20 what you can and cannot do with regard to Apple  
10:07:44 21 employees was as a result of an agreement that he had  
10:07:46 22 with Mr. Jobs?

10:07:47 23 A. I don't know if he used the term "agreement"  
10:07:52 24 as opposed to it was an understanding or discussion  
10:07:55 25 that he and Steve had had, Mr. Jobs had had.

10:07:58 1 Q. So he told you that he had an understanding  
10:08:00 2 with Mr. Jobs and, as a result of that understanding,  
10:08:02 3 he gave you guidelines on the types of things you can  
10:08:05 4 do to recruit Apple employees; is that right?

10:08:07 5 A. I wouldn't say that he gave us guidelines, and  
10:08:10 6 he may have had that discussion with someone else, but  
10:08:13 7 at that point in time I didn't report directly in to  
10:08:17 8 Bruce, and it was when I was senior director of  
10:08:20 9 talent. And so at that point in time, it was really  
10:08:24 10 Theresa Townsley who expressed what we should and  
10:08:28 11 should not do specific to Apple.

10:08:29 12 Q. Did you have a communication directly with  
10:08:31 13 Mr. Chizen about this?

10:08:33 14 A. I don't recall if we did have a direct  
10:08:39 15 communication, written communication.

10:08:41 16 Q. Right.

10:08:41 17 A. You know, at one point in time, he spoke to me  
10:08:45 18 very briefly about it.

10:08:46 19 Q. What did he say to you?

10:08:47 20 A. At that point in time, I think it was well  
10:08:51 21 beyond -- at that point in time, I don't even know what  
10:08:55 22 the date was. I was probably senior vice president of  
10:08:58 23 global talent, and it was not related to Apple  
10:09:01 24 whatsoever, and he was interested in knowing what our  
10:09:08 25 hiring practices were specific to another company.

10:44:05 1 did she report to you at that point?

10:44:06 2 A. No, at that point in time it was Ellen  
10:44:09 3 Swarthout.

10:44:09 4 Q. It was Ellen. Okay. Thank you.

10:44:11 5 I believe you testified earlier that one  
10:44:14 6 function of human resources at Adobe is recruiting  
10:44:18 7 employees, employees or talent to fill positions at the  
10:44:22 8 company?

10:44:22 9 A. That's correct.

10:44:22 10 Q. And another function of human resources at  
10:44:25 11 Adobe is to help retain employees at the company?

10:44:28 12 A. We don't have like a function per se that's  
10:44:33 13 called "retention," but certainly an overall  
10:44:37 14 responsibility of human resources is to help retain  
10:44:39 15 talent. That's right.

10:44:40 16 Q. Let's talk about recruiting for a bit.

10:44:43 17 Why is recruiting talent important for Adobe?

10:44:46 18 A. So our critical, most critical asset is  
10:44:50 19 people. So we're really an IP-based company.

10:44:53 20 Q. "IP" is intellectual property?

10:44:56 21 A. Correct. So that's -- you know, ultimately  
10:44:57 22 the only asset that we have as an organization is the  
10:45:04 23 bright minds of individuals and technologists or  
10:45:09 24 individuals who sell our products or market our  
10:45:11 25 products.

10:45:11 1 Q. So it's important to Adobe to have --

10:45:14 2 A. It's critical.

10:45:15 3 Q. It's critical to Adobe to have the best talent  
10:45:18 4 that you can have?

10:45:18 5 A. Correct.

10:45:20 6 Q. And -- but why is it important that Adobe  
10:45:23 7 actually recruits as opposed to just waits for people  
10:45:25 8 to call them?

10:45:26 9 A. Well, if you continue to grow as a company,  
10:45:30 10 you're not going to find -- the best people necessarily  
10:45:33 11 don't spend all their time looking to apply. So in --  
10:45:37 12 our belief is that there's multiple ways by which we  
10:45:40 13 can attract talent, and that often the very best  
10:45:45 14 candidates might not necessarily be looking for Adobe.  
10:45:48 15 They might not even know that Adobe is a company where  
10:45:52 16 they can leverage their capabilities. And so  
10:45:55 17 recruiting is a big, big aspect.

10:45:58 18 And the word "recruiting" denotes not only  
10:46:02 19 recruiting from external but also internal channels,  
10:46:06 20 too.

10:46:08 21 Q. So recruiting includes seeking employees or  
10:46:12 22 talent from outside of the company and also seeking to  
10:46:15 23 promote from within?

10:46:16 24 A. Absolutely. Or move from within, promote or  
10:46:19 25 move.



10:46:19 1 Q. Okay. So let's talk about recruiting from  
10:46:29 2 outside the company.

10:46:30 3 What are the primary means by which Adobe  
10:46:32 4 recruits talent from outside the company?

10:46:34 5 A. Employee referral, and that's always been a  
10:46:38 6 very active element of our overall recruitment  
10:46:42 7 practices. So, you know, we've always had an incentive  
10:46:46 8 program to have employees refer candidates for us.

10:46:49 9 A new college grad, university program is a  
10:46:52 10 big emphasis. So hiring talent right out of school.

10:46:57 11 Executive recruitment, where we actually over  
10:47:01 12 the years have changed. Historically we would have had  
10:47:05 13 firms that we work with. Now we have primarily our own  
10:47:09 14 in-house executive search firm.

10:47:12 15 We have employees who apply directly to us  
10:47:15 16 through Adobe.com, so our own online portal for -- I  
10:47:18 17 shouldn't say employees, but potential employees or  
10:47:22 18 prospects to actually profile or apply for jobs.

10:47:25 19 And then we have our own recruiters that are  
10:47:29 20 active in recruiting talent.

10:47:32 21 And then we have internal movement. So a  
10:47:35 22 percentage of employees that would be moving across or  
10:47:37 23 applying internally for jobs.

10:47:39 24 Q. Let's talk about executive recruitment.

10:47:41 25 You said that at some point Adobe retained

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13 (DONNA MORRIS)

14 HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

15 August 21, 2012

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17 Reported by: Anne Torreano, CSR No. 10520

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12:18:33 1 up. Our employees were going to look and say, jeez, is  
12:18:39 2 anything going to happen to our salaries? Google is  
12:18:42 3 getting this nice, you know, pre-holiday bonus.

12:18:44 4 And that's why Gloria's note is, "Timing is  
12:18:48 5 everything. Thanks for the head-up, as I'm certain it  
12:18:51 6 will come our way through employees."

12:18:53 7 Employees would end up learning about it  
12:18:55 8 because it would hit the news, and likely they would be  
12:18:57 9 wondering, has Adobe had a profitable year. We no  
12:19:00 10 longer have profit sharing. Will we get any form of a  
12:19:03 11 bonus or not?

12:19:04 12 Q. So just so the record is clear, what Google  
12:19:08 13 did in late 2010 was give all of its 23,000 employees a  
12:19:13 14 10 percent raise?

12:19:15 15 MR. KIERNAN: Objection to the extent it  
12:19:16 16 misstates her testimony and calls for speculation,  
12:19:19 17 lacks foundation. If she knows what Google did.

12:19:22 18 THE WITNESS: I do not know directly what they  
12:19:23 19 did other than what was in the public domain and what  
12:19:26 20 the press was reporting that they did.

12:19:29 21 BY MR. CRAMER:

12:19:29 22 Q. That they did.

12:19:30 23 So the first paragraph of Ms. Solanki's e-mail  
12:19:34 24 says, "Moving to plug the defection of staff to  
12:19:37 25 competitors. Google Inc. is giving a 10 percent raise

12:19:40 1 to all of its 23,000 employees, according to people  
12:19:44 2 familiar with the matter."

12:19:45 3 Do you see that?

12:19:45 4 A. Yes.

12:19:46 5 Q. Was that your understanding of what the press  
12:19:48 6 was reporting at the time?

12:19:49 7 A. Yes, just as this said.

12:19:52 8 Q. And it says, "The raise which will be given to  
12:19:54 9 executives and staff across the globe is effective in  
12:19:57 10 January."

12:19:57 11 Do you see that?

12:19:58 12 A. Yes.

12:19:58 13 Q. So that was the information that was coming up

12:20:01 14 through -- through the web site that you mentioned and

12:20:05 15 was being reported to people at Adobe; is that right?

12:20:10 16 A. People at Adobe would have had free access to

12:20:13 17 this, just like any other employee in the Valley.

12:20:16 18 Q. Right.

12:20:16 19 And so what you're saying, what Ms. Stinson is

12:20:20 20 saying is, "I'm certain this will come our way through

12:20:22 21 employees."

12:20:23 22 Do you see that?

12:20:23 23 A. Yes.

12:20:23 24 Q. So your -- what you said was that employees at

12:20:27 25 Adobe would notice that -- that Google had given all of

12:20:32 1 its employees a raise, and they would be wondering, is  
12:20:35 2 Adobe going to do something similar?  
12:20:36 3 A. Correct. Or it's likely that employees would  
12:20:43 4 wonder. They may or may not express that wonder, but  
12:20:46 5 it's likely that they would.

12:20:47 6 Q. So employees talk with each other about the  
12:20:51 7 compensation of other companies in the same space; is  
12:20:53 8 that right?

12:20:54 9 MR. KIERNAN: Objection to the extent it calls  
12:20:55 10 for speculation, lacks foundation.

12:20:57 11 THE WITNESS: I don't know how often they  
12:20:58 12 talk, but when something is in the public domain, such  
12:21:01 13 as this was, I don't -- it would be me speculating.  
12:21:07 14 I'm sure Google didn't mind everyone knowing that they  
12:21:10 15 were giving a 10 percent increase.

12:21:11 16 BY MR. CRAMER:

12:21:11 17 Q. Why did Google not mind that?

12:21:13 18 MR. KIERNAN: Wait. Objection. Lacks  
12:21:14 19 foundation, calls for speculation.

12:21:16 20 THE WITNESS: Yeah, I mean --

12:21:16 21 BY MR. CRAMER:

12:21:16 22 Q. Thought you said -- you said you're sure  
12:21:18 23 Google didn't mind everybody knowing it.

12:21:20 24 Why are you sure of it?

12:21:21 25 A. It's very generous, in a market that was --

12:21:24 1 many companies were suffering, given the recession.

12:21:28 2 Q. Now, the first paragraph there says, "Moving  
12:21:33 3 to plug the defection of staff to competitors, Google  
12:21:36 4 is giving a 10 percent raise."

12:21:38 5 What does that mean?

12:21:40 6 A. You have to ask Google.

12:21:41 7 MR. KIERNAN: Objection.

12:21:43 8 BY MR. CRAMER:

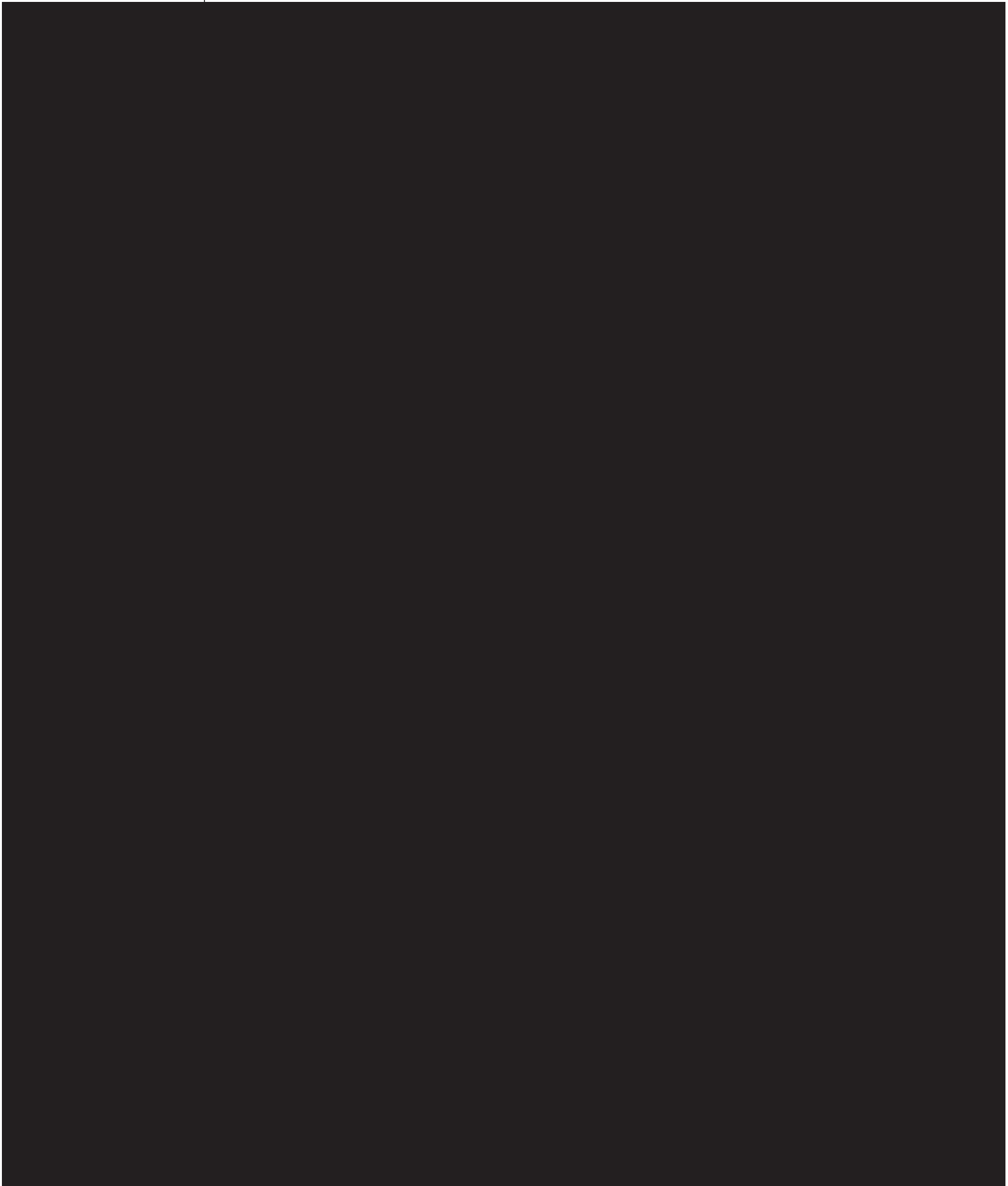
12:21:43 9 Q. As an HR director, someone who's been in HR  
12:21:46 10 her entire life, does that statement mean anything to  
12:21:49 11 you?

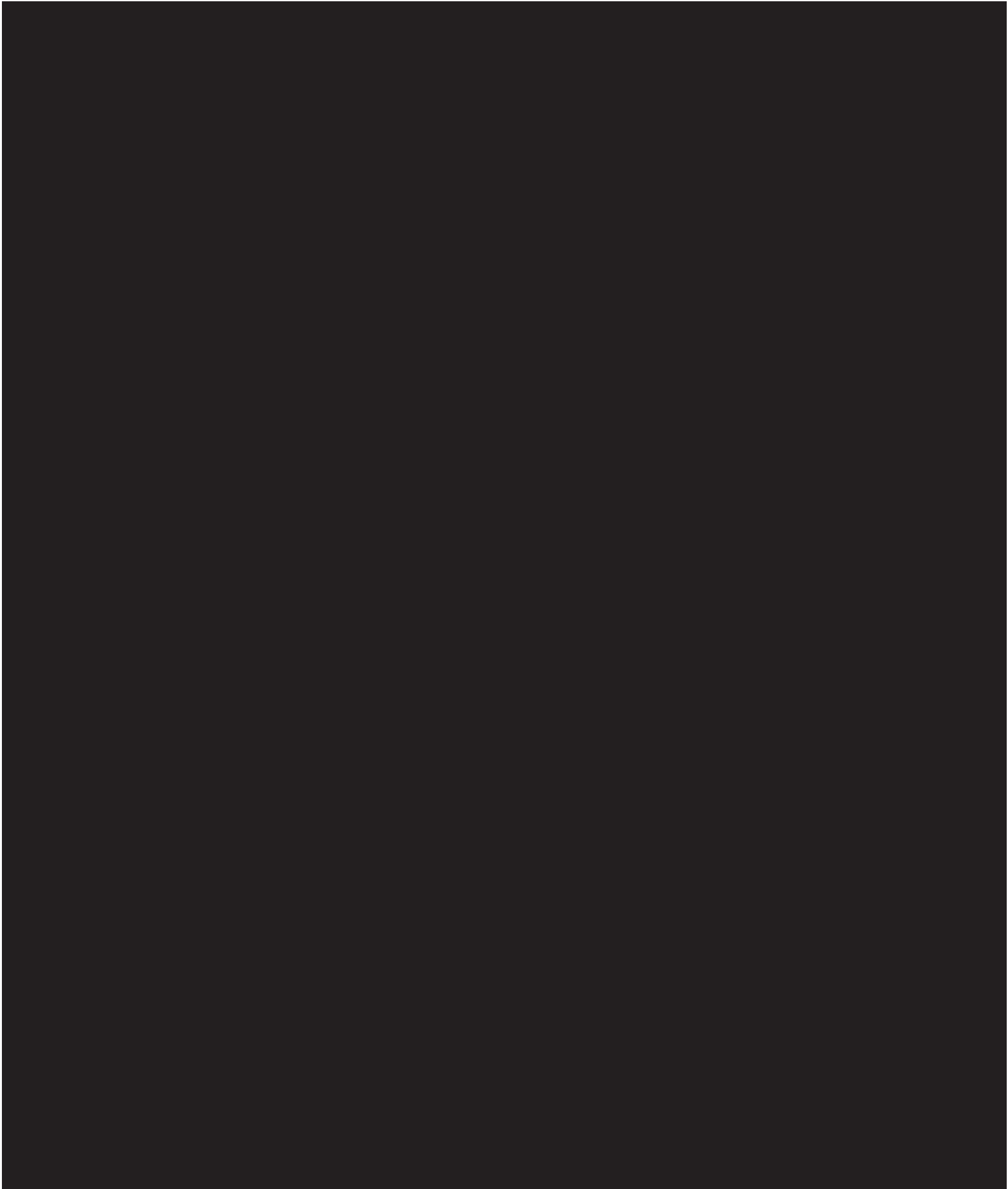
12:21:49 12 A. Clearly they were having a lot of individuals  
12:21:52 13 leaving. You just have to look at the share price of  
12:21:56 14 Google over a period of time and know that individuals  
12:21:59 15 that would have been hired by Google in the most recent  
12:22:03 16 history of this period of time would have likely had a  
12:22:07 17 big portion of their overall compensation that wasn't  
12:22:10 18 moving. And so those that came pre-IPO, post-IPO,  
12:22:16 19 would be very different.

12:22:17 20 So I would assume what they wanted to do is  
12:22:19 21 try to ensure that their pay practices were aligned,  
12:22:23 22 given they were becoming a more mature company.

12:22:25 23 Q. And one way to do that is raise everybody's  
12:22:29 24 salary 10 percent; is that correct?

12:22:30 25 A. I guess that's what they think is appropriate.











03:34:12 1 BY MR. CRAMER:

03:34:12 2 Q. Plaintiffs' Exhibit 225 is a one-page document  
03:34:33 3 bearing the Bates range 176APPLE002145.

03:34:39 4 MS. BROWN: And again, I make the same  
03:34:40 5 objection. This may actually be a document that we  
03:34:44 6 designated, but without any advanced warning, I can't  
03:34:47 7 verify that.

03:34:47 8 MR. CRAMER: Okay. It's also an Adobe  
03:34:50 9 document.

03:34:50 10 MS. BROWN: No, it's a document that was  
03:34:52 11 produced by Apple, and I don't see Ms. Morris's name on  
03:34:55 12 the document at all.

03:34:56 13 MR. CRAMER: Yeah, the e-mail is from  
03:34:57 14 Theresa -- the second e-mail is from Theresa Townsley  
03:34:59 15 to Donna Morris.

03:35:00 16 MR. KIERNAN: Why don't we deal with this at a  
03:35:03 17 break.

03:35:03 18 MR. CRAMER: Okay.

03:35:03 19 MR. KIERNAN: I mean, we've got your  
03:35:05 20 objection, but let's just deal with it at the break.

03:35:07 21 MR. CRAMER: Fair enough.

03:35:07 22 BY MR. CRAMER:

03:35:07 23 Q. So there's an e-mail from Theresa Townsley to  
03:35:11 24 Donna Morris, dated May 27th, 2005.

03:35:14 25 Do you see that?

03:35:15 1 A. Yes.

03:35:15 2 Q. Do you remember seeing this e-mail?

03:35:17 3 A. Yes, I do.

03:35:17 4 Q. And this was cc'd to Shantanu Narayen, Bruce  
03:35:25 5 Chizen and Gloria Stinson, and the subject is  
03:35:28 6 "Recruitment of Apple Employees."

03:35:29 7 Do you see that?

03:35:30 8 A. Yes.

03:35:30 9 Q. And Ms. Townsley says to you, "Hi, Donna.

03:35:35 10 Bruce and Steve Jobs have an agreement that we are not  
03:35:37 11 to solicit any," all caps, "Apple employees, and vice  
03:35:40 12 versa. Please ensure all your worldwide recruiters  
03:35:44 13 know that we are not to solicit any Apple employee. I  
03:35:47 14 know Jerry is soliciting one now, so he'll need to back  
03:35:51 15 off. Please help him with how to do that. Let me know  
03:35:55 16 if you have any questions."

03:35:56 17 Did I read that correctly?

03:35:58 18 A. Yes.

03:35:58 19 Q. So this is the e-mail that the head of HR sent  
03:36:01 20 to you on May 27th, 2005; is that right?

03:36:03 21 A. That's right.

03:36:04 22 Q. And she's explaining to you that there was an  
03:36:08 23 agreement between Bruce Chizen and Steve Jobs; right?

03:36:11 24 A. Yes.

03:36:12 25 Q. And that agreement said that Adobe was not

03:36:16 1 allowed to solicit any Apple employees; right?

03:36:19 2 A. Yes.

03:36:19 3 Q. And that Apple was not allowed to solicit any

03:36:23 4 Adobe employees; right?

03:36:24 5 A. Correct.

03:36:25 6 Q. And you were asked by Ms. Townsley to ensure

03:36:29 7 all of your worldwide recruiters to make sure not to

03:36:33 8 solicit any Apple employee; is that right?

03:36:35 9 A. Correct.

03:36:36 10 Q. Did you do that?

03:36:37 11 A. Yes.

03:36:39 12 Q. And Ms. Townsley says, "I know Jerry is

03:36:42 13 soliciting one now, so he'll need to back off."

03:36:46 14 Did you tell Jerry to back off his soliciting

03:36:49 15 of the Apple employee who he was -- referred to here?

03:36:54 16 A. I don't know who specifically they were

03:36:56 17 referring to, other than showing the one document that

03:36:58 18 had an individual's name on it.

03:37:01 19 Q. "Jerry" here is Jerry Vijungco?

03:37:05 20 A. No, that's Jerry Sastri.

03:37:06 21 Q. I'm sorry. Jerry Sastri.

03:37:08 22 So the way you're interpreting this is the --

03:37:14 23 that in the e-mail that Mr. Jobs sent to Mr. Chizen, he

03:37:17 24 had attached the e-mail from Mr. Sastri to the Apple

03:37:22 25 employee?

03:37:22 1 A. Right.

03:37:23 2 Q. Okay. And then Ms. Townsley says to you,

03:37:32 3 "Please help him with how to do that."

03:37:34 4 Do you see that?

03:37:34 5 A. Right.

03:37:35 6 Q. Did you do that? Did you follow

03:37:36 7 Ms. Townsley's direction?

03:37:37 8 A. I'm sure I told Jerry that he needed to back

03:37:42 9 off.

03:37:43 10 Q. Okay. And then the top of this e-mail is from

03:37:51 11 Bruce Chizen to Steve Jobs.

03:37:52 12 Do you see that?

03:37:53 13 A. Yes.

03:37:53 14 Q. So it's fair to say that Mr. Chizen, who was

03:38:00 15 cc'd on the e-mail from Ms. Townsley to you, forwarded

03:38:03 16 that to Mr. Jobs; is that right?

03:38:05 17 A. It would appear.

03:38:07 18 Q. And he says, "FYI"; right?

03:38:09 19 A. Yes.

03:38:10 20 Q. So Mr. Chizen is basically saying, look, we're

03:38:14 21 executing on the understanding that we have between

03:38:16 22 Mr. Chizen -- between our two companies; is that fair

03:38:19 23 to say?

03:38:19 24 MS. BROWN: Objection. Lacks foundation.

03:38:20 25 MR. KIERNAN: Argumentative.

## REPORTER'S CERTIFICATE

I, Anne Torreano, Certified Shorthand Reporter licensed in the State of California, License No. 10520, hereby certify that the deponent was by me first duly sworn, and the foregoing testimony was reported by me and was thereafter transcribed with computer-aided transcription; that the foregoing is a full, complete, and true record of said proceedings.

I further certify that I am not of counsel or attorney for either or any of the parties in the foregoing proceeding and caption named or in any way interested in the outcome of the cause in said caption.

The dismantling, unsealing, or unbinding of the original transcript will render the reporter's certificates null and void.

In witness whereof, I have subscribed my name this 31st day of August, 2012.

☒ Reading and Signing was requested.

☐ Reading and Signing was waived.

☐ Reading and Signing was not requested.

\_\_\_\_\_  
ANNE M. TORREANO, CSR No. 10520

**Exhibit 21**



Subject: Fwd: Sous Chef application  
Date: Tue, 03 Jun 2008 08:21:39 -0700  
From: Mark Bentley <mbentley@apple.com>  
To: Danielle Lambert <lambert@apple.com>  
Message-ID: <C85278AC-622D-4543-AD67-56F386FB2D3E@apple.com>

---

Heads up that we are getting a few folks from Google submitting their resumes to our website ( for the Dickman openings ). I spoke to Julie Gaither about the sensitivity around this a few weeks ago, and she gets it loud & clear ( as does John evidently ). We are not recruiting these folks, they are actively seeking us out.

Please let me know if you want recruiting to be handling this differently? Also, just as a side note, I have heard some rumblings the last couple of months that Google may not necessarily be honoring their part of the hands-off policy, although I don't have any hard evidence. I know we have lost a couple of people recently from HW to them, but I believe both were fairly unhappy folks, so it's hard to say how things actually got initiated.

Mark

Begin forwarded message:

**From:** Julie Gaither <julieg@apple.com>  
**Date:** June 2, 2008 3:05:40 PM PDT  
**To:** Mark Bentley <mbentley@apple.com>  
**Subject:** Fwd: Sous Chef application

Mark,

Another Bon Appetit - Google applicant

Begin forwarded message:

**From:** Julie Gaither <julieg@apple.com>  
**Date:** June 2, 2008 3:04:57 PM PDT  
**To:** John Dickman <dickman@apple.com>  
**Cc:** Carmina Calderon <carmina@apple.com>  
**Subject:** Sous Chef application

Hi John,

Forwarding you an applicant for Sous Chef:

**Cover Letter & Resume (Paste in text box) :**



June 1, 2008

Attention: Apple Recruiting-

My name is [REDACTED] and I am currently the day time Sous Chef in charge of No Name Café, Bon Appetit@Google. No Name is the second busiest café at Google headquarters, serving over 2500 meals and 1200 teas, daily. We have also been repeatedly voted among the top three favorite cafés out of the 18 cafes on the Google campus.

I started my food career at a catering company when I was 14 years old, and have worked continuously in the culinary

profession ever since, picking up my BAS in history and business at Mississippi State University on the way. I have worked at large and small restaurants, fine dining to French bistro, most recently accumulating over five years as a sous chef or higher. As my resume reflects, my experience includes extensive experience as an effective manager of staff, food cost, budgeting, labor cost, pricing, purchasing and receiving and service. I also like to have fun at work and strive for an enjoyable, low turn-over work experience for my staff and co-managers.

My tenure at Google, working with Executive Chef Nate Keller, under Culinary Director John Dickman, has further honed my skill set. It now also includes creating very high quality food at very high volume, an even stronger commitment to healthy as well as delicious food, higher awareness of sustainable sources and seasonal daily changing menus, a fast reaction time to necessary changes in the culinary program, and creating a warm, friendly café that employees love to eat in every day.

It would be an honor and a privilege to work again with John Dickman. If you are interested in further exploring what I can add to the culinary program at Apple, please call me to set up an appointment to meet at your convenience.

Best Regards,

[REDACTED]

[REDACTED]

Objective To challenge myself and my staff by expanding our knowledge of food, improving cooking technique, and striving for efficiency while adhering to high quality and sustainable food sources.

Experience Bon Appetit @ Google, No Name Café, Mt. View, California  
February 2007 - Present  
Sous Chef

Began as opening kitchen manager of a new Google café, Café Five. Was soon promoted to Sous Chef of No Name Café. Now manage all aspects of 2nd largest Google Café, serving over 2500 daily meals from a daily changing menu.

Effectively manage a multicultural staff of 55+ in a café with a \$6.5M annual operating budget  
Write a daily changing menu for breakfast, lunch, dinner and afternoon tea, serving over 2500 meals per day plus 1200 daily teas  
Supervise the overall success of the Café through adhering to Google/Bon Appétit's food values of delicious, healthy food made daily from scratch. Use sustainable, organic food sources whenever possible  
Instill a top level of warm and friendly service in the staff, catering to engineers and Google founders  
Strive daily to foster a sense of responsibility and awareness among cooks in regards to quality, sustainability, locality/seasonality, and community

Tutor Language Tech, Prague, Czech Republic  
September 2005 - August 2006 English Teacher

Taught 1-14 university age students for 50-60 hours/week. Used additional time traveling Europe with regional cuisines as a passionate focus.

Nenana View Grille, Denali National Park, Alaska April 2005 - September 2005 (full season) Chef De Cuisine

Began as sous chef, attention to detail and commitment to standards quickly led to promotion to chef de cuisine.

Solely responsible for all BOH operations, including menu planning, ordering/receiving product, and adhering to budget constraints  
Established and maintained excellent rapport with vendors  
Scheduled and trained 35 employees  
Senior manager in charge of high volume (140 seat) hotel restaurant with exceptional standard of quality, open nearly 24 hours/day. Served approximately 500 meals per day.

Café Degas, New Orleans, Louisiana  
October 2004 - April 2005  
Lead Cook

Served as lead cook in a small French Bistro. Opportunity to hone technique with Chef Ryan Hughes and learn the workings of a French neighborhood bistro.

Developed organizational skills to most effectively work within a small venue of 60 seats  
Refined specifically French cooking skills with primarily French staff

Palace Café, New Orleans, Louisiana January 2001 - October 2004 Sous Chef Began as line cook and was quickly promoted to lead cook, then saucier and then sous chef, under Chef Darin Nesbit. Palace Café is a 250-seat fine dining restaurant that has received the Ivy and James Beard awards.

Responsible for ordering and creating specials utilizing fresh, local ingredients  
Instrumental in team building and instructing staff of 50 in the importance of professional demeanor and cleanliness  
Practiced quality control within high volume café and ensured that standards were met throughout service

Ralph's on the Park, New Orleans, Louisiana  
November 2003 - April 2004  
Opening Team Member

Granted a six month hiatus from Palace Café to open Ralph's on the Park with Chef Gerard Maras.

Instrumental in creating consistent atmosphere and establishing continuity within family of restaurants  
Maintained commitment to working with fresh local ingredients  
Developed routines that enabled maximum exposure to learning opportunities with Chef Maras

Education Mississippi State University  
B.A.S., Summa Cum Laude, History major, General Business minor, 1999

Tipton-Rosemark Academy  
High School Diploma, 1995

ITC Praha, Czech Republic  
TEFL Certificate (Teaching English as a Foreign Language), December 2005

Interests I enjoy traveling, hiking, fishing, and mechanics

Excellent References Available upon request  
Julie Gaither | Recruiting Manager | Apple Inc | direct 408.974.0038

Julie Gaither | Recruiting Manager | Apple Inc | direct 408.974.0038

---

----- end message -----

**Exhibit 24**



From: Shona Brown Sent: 3/11/2007 12:57 PM  
 To: [ - ] Arnon Geshuri  
 Cc: [ - ] Eric Schmidt; Laszlo Bock; Judy Gilbert  
 Bcc: [ - ]  
 Subject: Re: FW: Google Recruiting from Apple

Arnon-

Appropriate response. Please make a public example of this termination with the group. Please also make it a very strong part of new hire training for the group. I want it clear that we have a zero-tolerance policy for violating our policies. This should (hopefully) prevent future occurrences.

On 3/8/07, Arnon Geshuri <arnnon@google.com> wrote:

Eric,

On this specific case, the sourcer who contacted this Apple employee should not have and will be terminated within the hour. We are scrubbing the sourcer's records to ensure she did not contact anyone else.

In general, we have a very clear 'do not call' policy (attached) that is given to every staffing professional and I reiterate this message in ongoing communications and staffing meetings. Unfortunately, every six months or so someone makes an error in judgment, and for this type of violation we terminate their relationship with Google.

Please extend my apologies as appropriate to Steve Jobs. This was an isolated incident and we will be very careful to make sure this does not happen again.

Thanks,  
 Arnon

On 3/8/07, Eric Schmidt <eschmidt@google.com> wrote:

I believe we have a policy of no recruiting from Apple and this is a direct inbound request. Can you get this stopped and let me know why this is happening? I will need to send a response back to Apple quickly so please let me know as soon as you can.

Thanks Eric

---

From: Steve Jobs [mailto:sjobs@apple.com]  
 Sent: Wednesday, March 07, 2007 10:44 PM  
 To: Eric Schmidt  
 Subject: Google Recruiting from Apple

Eric,

I would be very pleased if your recruiting department would stop doing this.

Thanks,  
 Steve

Begin forwarded message:

From: [REDACTED]  
Date: March 7, 2007 9:46:13 AM PST  
To: [REDACTED]  
Subject: Google.com Engineering Recruitment Team

Hello Maciej,

My name is [REDACTED] and I am a Recruiter for the "Google.com Engineering" team formerly known as the "Site Reliability Engineering" team. I found your contact information on the Internet. I am interested to know more about your past work experience and openness to new opportunities. We currently have positions available at Google that may be a good match for you. If you are open to exploring these opportunities further please send an updated version of your resume in word, html, or pdf form to me as soon as possible. Let me know when would be a good time to talk, please include your phone number.

To give you an idea of the Engineers I am looking for I have included links to job descriptions below.

Please take a look at these links for more information:

Mountain View:  
[http://www.google.com/support/jobs/bin/topic.py?dep\\_id=1058&loc\\_id=1116](http://www.google.com/support/jobs/bin/topic.py?dep_id=1058&loc_id=1116)

SantaMonica:  
[http://www.google.com/support/jobs/bin/topic.py?dep\\_id=1058&loc\\_id=1118](http://www.google.com/support/jobs/bin/topic.py?dep_id=1058&loc_id=1118)

Kirkland, WA:  
[http://www.google.com/support/jobs/bin/topic.py?dep\\_id=1058&loc\\_id=1123](http://www.google.com/support/jobs/bin/topic.py?dep_id=1058&loc_id=1123)

New York:  
[http://www.google.com/support/jobs/bin/topic.py?dep\\_id=1058&loc\\_id=1122](http://www.google.com/support/jobs/bin/topic.py?dep_id=1058&loc_id=1122)

Ireland:  
[http://www.google.ie/support/jobs/bin/topic.py?dep\\_id=1058&loc\\_id=1110](http://www.google.ie/support/jobs/bin/topic.py?dep_id=1058&loc_id=1110)

Switzerland:  
[http://www.google.ch/support/jobs/bin/topic.py?dep\\_id=1058&loc\\_id=1115](http://www.google.ch/support/jobs/bin/topic.py?dep_id=1058&loc_id=1115)

I hope you are not bothered by my networking attempt. If you are not interested in or available for this career opportunity, please forward my name and contact information to your friends or colleagues who would be interested.



Thank you and I hope to hear from you soon.

Sincerely,

  
Site Reliability Engineering (Staffing)  
Google Inc.  
1600 Amphitheatre Parkway  
Mountain View, CA 94043  
sburan@google.com  
650.253.1446

**Exhibit 25**



From: Shona Brown Sent: 2/16/2006 4:38 PM  
 To: [ - ] Eric Schmidt; Alan Eustace  
 Cc: [ - ] Arnon Geshuri  
 Bcc: [ - ]  
 Subject: Fwd: FW: Recruiting

Eric/Alan-  
 Arnon provides comprehensive report below. Bottom line -- we don't believe there is any merit in Steve Job's assertion re. poaching of Apple engineers.  
 Shona

----- Forwarded message -----

From: Arnon Geshuri <arnnon@google.com>  
 Date: Feb 15, 2006 9:42 AM  
 Subject: RE: FW: Recruiting  
 To: Shona Brown <shona@google.com>

Findings of Investigation:

Exec Summary:

- \* Staffing is adhering to the "Do Not Call" protocol for Apple and understands there is no cold calling into the company
- \* Over the last 36 hours, staffing spoke with 15 people from the Android, Wireless, and Mac engineering teams on this topic.
- \* Andy Rubin, who leads Android, has been extremely explicit with everyone on the Android team not to touch folks at Apple. Staffing provided Andy and team with the protocol several months ago. They have not formally interviewed anyone at Apple.
- \* Findings indicate that there have been ongoing interactions between Google and Apple iPod engineers on a more social level.
- \* Conclusion: We have not found any evidence that we are targeting the iPod team and both staffing and engineers are very aware of our do not touch protocol with Apple.

Additional Recruiting Activity

- \* Robert Nielsen, Google Software Engineer, said the Aperture group at Apple had a "meltdown about a month ago, people were mistreated, and four of them threatened to leave." One of them did leave, and came to work for us. The other three were reassigned to other groups within Apple. He said he is "incredibly" careful to not recruit out of there or try and entice friends to work here. Separate from Robert's connections, several of the Aperture folks have recently decided to consider Google as their next career move. Dan Waylonis, Apple SWE, who also worked on the Aperture team was contacted by our sourcing team within the last several months and recently decided to come

interview here and has been extended an offer. Additionally, Dan Fish, SWE from the Aperture team, is in 3rd round interviews.

\* From General Engineering recruiting efforts, there are three Apple SWEs that applied directly to jobs@google - Tom Bonura, Yashodan Gokhale, Steve Zellers – all three have not been contacted yet. There are also two referrals - Brent Shank (referral not contacted yet) and Bill Bumgarner (referred originally in 2003 is back in play)

Special Note:

\* There is a candidate that has been interviewing with us by the name of James Magee – a very senior kernel developer who will most likely join our Linux Kernel group. Per Robert Nielsen, Google SWE, "it will hurt Apple a lot if he leaves, so we may hear about that one." He has not received an offer yet (he's in initial EMG review) and we are assuming that Apple is not aware of this. But Google is clean on this one - we have a paper trail that shows that he applied directly through jobs@google.

---

From: Shona Brown [mailto:shona@google.com]  
Sent: Tuesday, February 14, 2006 4:45 PM  
To: Arnon Geshuri  
Subject: Re: FW: Recruiting

If that is the case, find out whether they told any recruiters what they were doing (who should have told them about Apple sensitivities).  
slb

On 2/14/06, Arnon Geshuri <arnon@google.com > wrote:

I am investigating and upon initial review it looks like the engineers from the Android team are reaching out directly to their contacts on the iPod team at Apple. I am getting confirmation asap on this and want to look through the information and will report back the facts.

---

From: Shona Brown [mailto:shona@google.com]  
Sent: Tuesday, February 14, 2006 4:33 PM  
To: Arnon Geshuri  
Cc: Sergey Brin; Eric Schmidt  
Subject: Re: FW: Recruiting

Arnon-  
Pls investigate and send me a full report. I assume we have been carefully following the protocol. But, please get the facts and get back to me. thx.  
Shona

On 2/13/06, Eric Schmidt <eschmidt@google.com > wrote:

Please review and make sure we are not recruiting Apple.. Eric

-----Original Message-----

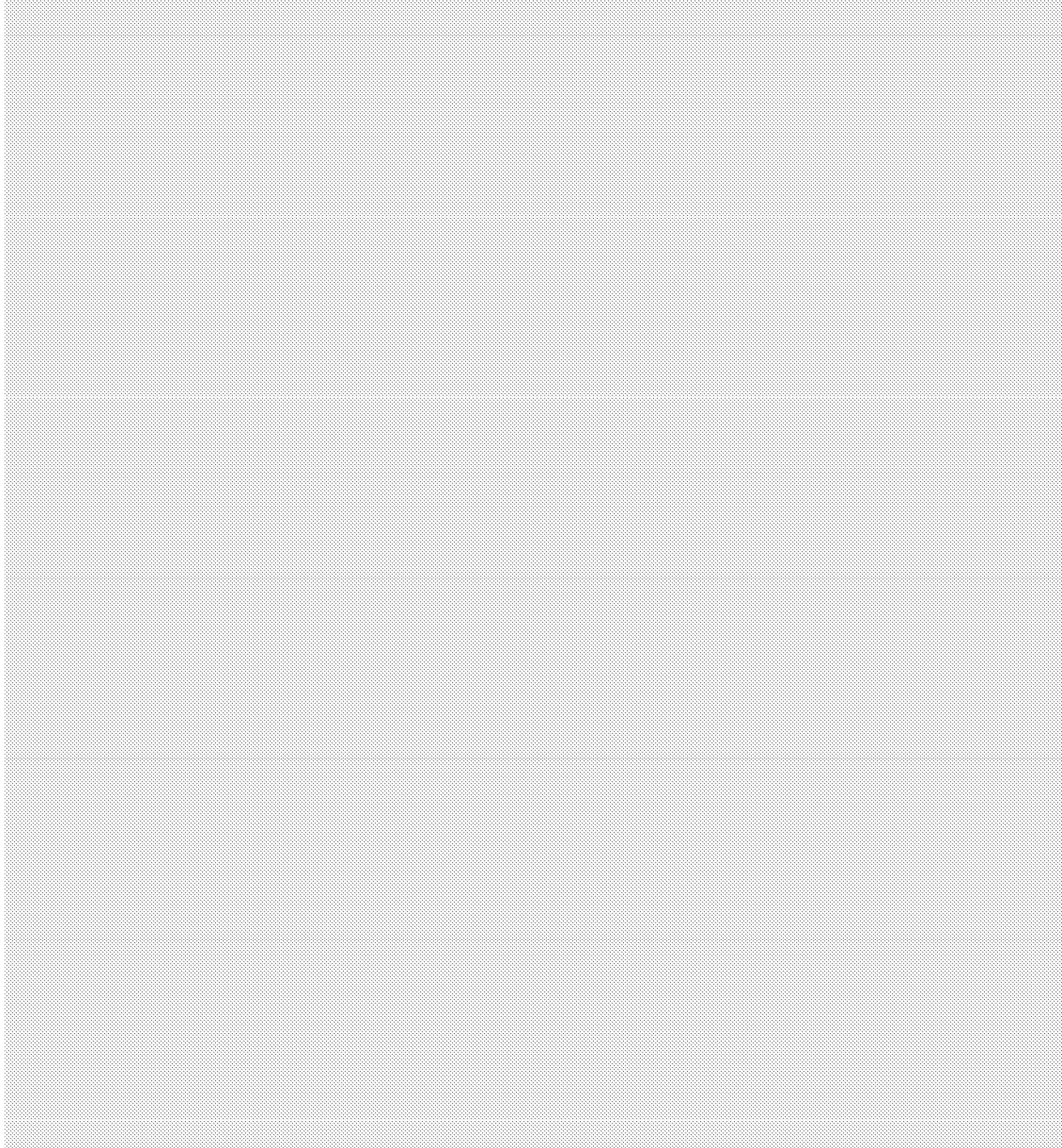
From: Steve Jobs [mailto:sjobs@apple.com]  
Sent: Monday, February 13, 2006 3:15 PM  
To: Eric Schmidt  
Subject: Recruiting

Eric,

I am told that Googles new cell phone software group is relentlessly recruiting in our iPod group. If this is indeed true, can you put a stop to

it?

Thanks,  
Steve



**Exhibit 29**



**Special Agreement Hiring Policy**  
**Protocol for “Do Not Cold Call” and “Sensitive” Companies**

---

The following companies have special agreements with Google and are part of the “Do Not Cold Call” list.

**Effective March 6, 2005:**

- Genentech, Inc.
- Intel Corporation
- Apple Computer
- Paypal, Inc.
- Comcast Corporation

**Effective January 20, 2006:**

- OpenTV Corporation
- Nvidia Technologies Corporation

**Effective April 10, 2006:**

- Intuit Inc.

**Effective November 06, 2006:**

- eBay, Inc.

Do not contact the following individuals from Intuit:



For each of these “Do Not Cold Call” companies, Google has agreed to the following protocol:

1. Not to directly cold call into those companies;



**Special Agreement Hiring Policy**  
**Protocol for "Do Not Cold Call" and "Sensitive" Companies**

2. But, we would accept internal or external references that indicated that an individual was "looking;"
3. And, of course, we will also accept direct solicitation from a candidate (this will most likely come into play when an individual's peer has recently joined us).

---

Due to our partnerships, the following companies fall under the **"Sensitive"** companies list:

- AOL, Inc.
- AskJeeves, Inc.
- Clear Channel
- Earthlink, Inc.
- IBM
- Lycos
- NTL Incorporated

For each of these **"Sensitive"** companies we agreed to the following protocol:

1. Executive Recruiting: Inform EMG of any Director level or above candidate who we have engaged and who is starting the interview process at Google
2. Executive Recruiting: If we go to offer with a Director or above candidate, Staffing should inform EMG and EMG will designate a senior exec to place a courtesy call into the Sensitive company to let them know we have made an offer;
  - a. And by exception, when EMG deems necessary, calling into a Sensitive company to indicate we will be making an offer.
3. General Recruiting: For any non-exec position, we should be aware the company is on the Sensitive Company list but there are no restrictions to our recruiting from these companies at junior levels.

---

Please be cautious when recruiting teams from any company to keep our candidates and potential employees safe from legal action. Most companies have non-solicit agreements which would limit or prohibit a candidate from asking a coworker to interview with us as well.

---

**Exhibit 32**



From: Arnon Geshuri. Sent: 4/19/2007 2:04 PM.  
 To: [ - ] Brad Strader.  
 Cc: [ - ]  
 Bcc: [ - ]  
 Subject: Fwd: Hiring our guys.

Can you help me with this Eric firedrill. Same kind of spreadsheet we created in the past.

Let's check on [REDACTED] first to see if he actively came to us or we sourced him.

Thanks.

----- Forwarded message -----

From: Laszlo Bock <laszlo@google.com>  
 Date: Apr 19, 2007 1:50 PM  
 Subject: Re: Hiring our guys  
 To: Eric Schmidt <eschmidt@google.com>, Shona Brown <shona@google.com>, Arnon Geshuri <arnon@google.com>

(+Arnon)  
 Eric,

We'll put Dell on "do not call" for the next 2 months.

Arnon's team will investigate if this particular one was inbound or if we found him, and do a report of Dell folks in process today. We'll send a summary back to you so you have the facts for your next conversation with Michael.

Best,  
 -Laszlo

----- Original Message -----

From: Eric Schmidt <eschmidt@google.com>  
 To: Laszlo Bock; Shona Brown  
 Sent: Thu Apr 19 15:43:05 2007  
 Subject: FW: Hiring our guys

Lets put them on the "dont call into Dell" list for a while. Thanks eric

---

From: Pam Shore [mailto:pshore@google.com]  
 Sent: Thursday, April 19, 2007 10:56 AM  
 To: Eric Schmidt; Shona Brown  
 Subject: Fwd: Hiring our guys

----- Forwarded message -----

From: Michael@dell.com <Michael@dell.com >  
 Date: Apr 19, 2007 8:12 AM  
 Subject: Hiring our guys  
 To: ericschmidt@google.com

Eric,

I learned recently that Google extend an offer to one of our sales guys,

[REDACTED]  
 Not real happy about this and not the kind of think we would expect given our partnership.



We should discuss next time we are together but I think we should have a general understanding that we are not actively recruiting from each other.

Michael

**Exhibit 34**



## *Arnnon's Top 10*

### **10. The Sourcer Newsletter: Summer 2007 Issue**

Follow the link below to view the summer issue of *The Sourcer* - an internal newsletter for the staffing organization on sourcing techniques, trends in the marketplace, and helpful tips.

Please enjoy the current issue featuring the following topics:

- Firefox keyword shortcuts
- Using social networking sites
- Boolean Tips: Google advanced operators
- Green recruiting
- Sourcing and the perception of spam
- Who's who at Google

If you have any topics of interest, please send them to Jeff Polo [jpolo@google.com](mailto:jpolo@google.com) for inclusion in the next issue.

### **9. Updated Resume Database Passwords.**

Below you will find a link to the UPDATED LIST OF RESUME DATABASE PASSWORDS on our staffing site. Thank you for your patience as we update these on the second Monday of every month.

(<https://mail.google.com/a/google.com/?view=page&name=js&ver=17vmmoi4on7uv>)

### **8. Google Teams Growing Quickly in China.**

Sukhinder Singh-Cassidy, Kirsten Manning, Griffin Golamco, Crid Yu and James Mi first set foot in Shanghai in January 2005. Since then, the Greater China region has grown from 0 to around 723 Googlers (including temporary workers and vendors) in the following locations:

Beijing:	589
Shanghai:	72
Guangzhou:	5
Taiwan:	41
Hong Kong:	16
-----	
TOTAL:	723

On August 6<sup>th</sup>, we transferred the majority of the open requisitions to the teams in Beijing, Shanghai and Taipei from the USA SWAT team. This decision was a

result of the China offices all reaching sizeable proportions and HR Director Tao Deng's group growing to twenty-six people. To assist with the local teams' efforts, we are also pleased to announce that Aki Taha, has moved to China to lead efforts along with our new Greater China Staffing Manager, Maria Yin, who joined this week.

The transfer of requisitions and the China teams' growth to date were celebrated in New York's China Town where the USA team shared *dim sum* and reminisced over the China launch stories and statistics.

We are excited that Greater China has grown to this point and look forward to seeing it grow even more with the local HR team leading the way and the SWAT team supplementing as needed.

**7. Google Leads v2.1 was released to production yesterday.**





## 6. ATTENTION: Recruiters for North America Positions

Earlier this year, we kicked off an initiative to revise our job descriptions for all departments globally. We have already revised the job descriptions for Sales, Legal and Mobile Engineering. Each requisition is being revised according to a standard format to create consistent, descriptive and clearly written job descriptions.

The goals of this project are to:

- 1) Incorporate a consistent Google 'look and feel' within each requisition.
- 2) Provide a clean, global structure for how all job descriptions should be written.
- 3) Improve the candidate experience by making it easier for potential candidates to find the right position suitable to their background.
- 4) Increase the pipeline of targeted candidates for recruiters.

### Next Steps for Recruiters for North America Positions (except SWE jobs)

While the writer is working on revising the job descriptions with the Hiring Managers from each department, **we first need recruiters for North America positions to reformat your job descriptions (except SWE job descriptions)** according to the template and guidelines below and attached. **This must be done by the end of Q3.**

**The area:** This paragraph should be 4-8 sentences, describing the team or area that this position is in. This should be the same paragraph for all positions within this team/area.

*Find **approved area overviews** for each department listed on the job site. **Note:** As Jon revises the job descriptions for each department, he can write more targeted 'area' overviews for specific teams or groups within a department*

**The role:** This paragraph should be 4-8 sentences and should provide a general overview of what the job entails, who the applicant will be working with/reporting to, and a brief description of the type of attributes you're seeking.

**Responsibilities:** List a maximum of 5 responsibilities

**Requirements:** List a maximum of 7 requirements.

**\*\*Note:** this also is a great opportunity for you to 1) ensure that the jobs that you have posted really should be posted and 2) verify that your job descriptions have updated content.

Please view the **Google Job Requisitions Style Guide** for more guidelines on creating job descriptions.

If you have any questions or concerns, please email [requisitionreview@google.com](mailto:requisitionreview@google.com)

#### **5. Google's Competitive Advantage**

Forbes online writer Brian Caulfield takes a stab at highlighting the weaknesses of the Google hiring process in his August 3, 2007, article "The Recruiting Wars: How To Beat Google To Tech Talent."

Follow the link below to read his brief but thoughtful critique.

[http://www.forbes.com/technology/2007/08/02/recruiting-silicon-valley-tech-cx\\_bc\\_0803talent.html](http://www.forbes.com/technology/2007/08/02/recruiting-silicon-valley-tech-cx_bc_0803talent.html)

#### **4. NooglerAdmin Update - Wednesday Noon Deadline for Recruiters!**

The Wednesday deadline for recruiters to enter information in the Noogler record is **NOON IN THE CANDIDATE'S WORK LOCATION TIME ZONE**. So, if a recruiter is based in Mountain View, but the candidate will work in Japan, the recruiter needs to have all of the candidate's information entered by noon Japan time, NOT Mountain View time.

#### **3. New engineering employee referral program.**







## **2. New Guidelines for SWE Interviews.**

Confused by what interview questions are banned? Wish you could find out why a question was banned, or discuss why you think other questions should be? Looking for sample questions to inspire you?

The hiring grouplet is proud to announce our revamped banned interview question lists, using the Ideas board framework, which you can find at <https://ideas.corp.google.com/InterviewQuestions/> . You can now submit a question for banishment, and others can comment on whether it should or shouldn't be banned.

We've also opened up the board as an interface for coming up with good sample questions. Feel free to submit sample questions, but please read <http://wiki/Main/InterviewQuestionsEditRules> before doing so. We're doing this on a trial basis, and we're taking feedback on this, hence the limited release for now (eventually we'll send an email to eng-announce). If you feel strongly about this, can you play around with the interface and *then* give us feedback? Feel free to email [hiring-grouplet@google.com](mailto:hiring-grouplet@google.com) to let us know if you feel the mixing of sample and banned questions works. Otherwise, we have a few other options:



- \* Banned and sample questions co-exist on the list.
- \* Banned questions go on this list, and sample questions exist somewhere else, possibly hosted by engEDU.
- \* Banned questions go on this list, and there's no real need for sample questions.
- \* Interview questions? What are those?

So please feel free to play around, submit proposed banned or sample questions, and rate sample questions accordingly.

***Some FAQs Before You Get Started:***

- \* Why would you ban a question?

Usually it's because the question has been exposed in too many different places, on blogs or various forums.

- \* What's the reason for this list?

We felt like there was a lot of confusion surrounding banned interview questions at Google, and the number of questions sent to hiring-grouplet about banned questions has been increasing in the last few months. Not only was it hard to find the list, there was also very little accountability in terms of who added to it, and no rationale for certain questions finding their way to the list.

- \* Why weren't the former banned questions migrated from the old list ([http://glists.corp.google.com/glistsp?action=list\\_embedded&list\\_id=L19168](http://glists.corp.google.com/glistsp?action=list_embedded&list_id=L19168))?

We felt like there was no way to figure out who had added those questions, and what the banning was for. If you feel strongly that a question should be banned, feel free to submit it to the new list and people can start contributing their thoughts. If it really should be banned, few people will object.

Huge thanks go out to Ethan Bradford for all his coding, Chien-I Liao, Hanah Kim, Bruce Murphy, and Ping Zhou for initial brainstorming, and all the members of the hiring grouplet for their invaluable feedback. Feel free to send any feedback to [hiring-grouplet@google.com](mailto:hiring-grouplet@google.com).

Again, the link is <https://ideas.corp.google.com/InterviewQuestions/>

**1. Training Schedule:**

***Google Leads Training:***

Wednesday, August 15<sup>th</sup>, 9:00am – 12:30pm PDT, Emerald Bay

***Life of an Offer Workshop:***

Tuesday, August 21<sup>st</sup>, 9:30pm – 12:30pm PDT, Emerald Bay

***Offer Workflow Workshop:***

Tuesday, August 21<sup>st</sup>, 2:00pm – 5:00pm PDT, Emerald Bay

***Hiring Temporary Workers:***

Wednesday, August 22<sup>nd</sup>, 2:00pm – 5:00pm PDT

+ To register for any staffing training session just send an email to Carson Page (carsonp@google.com) specifying which training you would like to attend and when.

+ For more information about the content of each class, visit the Staffing Training website at:

<http://gweb.corp.google.com/staffing/site.cgi?tab=training&page=training/training.html>

**Exhibit 37**

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**From:** Jonathan Rosenberg <jonathan@google.com> on behalf of Jonathan Rosenberg  
**Sent:** Wednesday, August 23, 2006 3:42 AM  
**To:** Laszlo Bock; Jonathan Rosenberg  
**Cc:** janicew@google.com; Martha Josephson; Shona Brown  
**Subject:** RE: [REDACTED]

Thanks. Campbell and I already discussed this and agreed that either way I should give a courtesy call to Paul Otellini. I'm meeting with [REDACTED] tomorrow and I will ask him how he wants to handle communication to Intel management before we even get to the stage of specifically discussing an offer.

Jonathan

---

**From:** Laszlo Bock [mailto:laszlo@google.com]  
**Sent:** Tuesday, August 22, 2006 7:25 PM  
**To:** Jonathan Rosenberg  
**Cc:** janicew@google.com; Martha Josephson; Shona Brown  
**Subject:** RE: [REDACTED]

Jonathan - Just looked more closely at this list....Intel is "do not cold call", which we haven't (nor has EZI). No action needed prior to extending an offer on our part. -- Sorry for my earlier note.

---

**From:** Laszlo Bock  
**Sent:** Tuesday, August 22, 2006 7:23 PM  
**To:** Jonathan Rosenberg  
**Cc:** 'janicew@google.com'; 'Martha Josephson'; Shona Brown  
**Subject:** [REDACTED]

Jonathan,

Just a reminder that Intel is on our "sensitive companies" list. Not sure if Eric or someone else is the right person to call before we extend the offer. Let me know if/when you plan to extend and we can coordinate that discussion with Intel.

Thanks,  
Laszlo

**Exhibit 39**

---

**From:** Shona Brown <shona@google.com> on behalf of Shona Brown  
**Sent:** Saturday, November 19, 2005 1:11 AM  
**To:** Martha Josephson  
**Cc:** Campbell, Bill; Jonathan Rosenberg  
**Subject:** Re: FW: Google CMO search

MJ-

We have a set of companies that we are particularly sensitive to (I asked Arnnon to forward to you in separate email) and that we want emg to know if any of their senior folks are being approached. It is a very short list. With these, I suggest ezi make sure we are aware before contact is made and also that the language is clearer that you are looking for leads and not the individual's own interest. thx.

slb

On 11/18/05, **Martha Josephson** <Martha.Josephson@ezi.net> wrote:

He has been helpful with referrals in the past and we ask people like him all the time for ideas. We know full well that we can't touch Intuit people as targets. (We also know we can't call this "CMO" after the first discussion, but the initials help orient outsiders to the type of seniority we need.) Please forgive? mj

Martha Josephson  
Egon Zehnder International  
1290 Page Mill Road  
Palo Alto, California 94304-1122  
650-847-3055  
650-283-3109 (mobile)  
650-847-3050 (fax)  
[www.zehnder.com](http://www.zehnder.com)

-----Original Message-----

**From:** Shona Brown [mailto:shona@google.com]  
**Sent:** Friday, November 18, 2005 3:01 PM  
**To:** Campbell, Bill; Martha Josephson  
**Cc:** Jonathan Rosenberg  
**Subject:** Re: FW: Google CMO search

Martha-

This is pretty bad. Can you educate your colleagues please.

slb

On 11/18/05, **Campbell, Bill** <Bill\_Campbell@intuit.com> wrote:  
Jonathan

Are you guys nuts?

Bill

-----Original Message-----

From: [REDACTED]  
Sent: Friday, November 18, 2005 1:09 PM  
To: Campbell, Bill  
Subject: Fw: Google CMO search



thought you'd enjoy this!

Happy Thanksgiving and maybe I'll see you at the Stanford game.

-----Original Message-----

From: Kim Van Der Zon <kvdz@ezi.net>

To: [REDACTED]

Sent: Fri Nov 18 12:41:25 2005

Subject: Google CMO search

[REDACTED]

I am a Partner at Egon Zehnder International, and one of my colleagues suggested that I contact you in regards to a search we are conducting on behalf of our client Google for the newly created role of CMO. I have attached the spec for your perusal and look forward to any thoughts you may have.

Many thanks in advance for your time and consideration.

best,  
Kim

<<Spec Google Head of Mktng.ZIP>>

Kim Van Der Zon  
Egon Zehnder International  
350 Park Avenue  
NY, NY 10021  
Phone: 212.519.6160  
FAX: 212.519.6064  
[kvdz@ezi.net](mailto:kvdz@ezi.net)

Assistant:  
Rhonda Randall-Bell  
212.519.6164  
[rhonda.randall-bell@ezi.net](mailto:rhonda.randall-bell@ezi.net)

Egon Zehnder International, with more than 300 consultants located in 58 wholly owned offices across 36 countries worldwide, specializes in senior level executive search, Board consulting and Director search, management appraisals, and talent management.

\*\*\*\*\*  
\*\*\*\*\*

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This message has been swept by Mailsweeper for the presence of computer viruses.

\*\*\*\*\*  
\*\*\*\*\*

<<Spec Google Head of Mktng.ZIP>>

**Exhibit 40**

---

**From:** Campbell, Bill <bill\_campbell@intuit.com> on behalf of Campbell, Bill  
**Sent:** Tuesday, February 13, 2007 9:41 PM  
**To:** Laszlo Bock  
**Cc:** Shona Brown  
**Subject:** RE: Russell Reynolds Contact

**Thanks so much.....**

**bill**

---

**From:** Laszlo Bock [mailto:laszlo@google.com]  
**Sent:** Tuesday, February 13, 2007 1:39 PM  
**To:** Campbell, Bill  
**Cc:** Shona Brown  
**Subject:** RE: Russell Reynolds Contact

Hi Bill,

This candidate actually reached out to a Googler about exploring opportunities here, which is how we found out about him. Intuit is on our "do not solicit" list. When I saw this candidate's name in my weekly update with Russell Reynolds, I re-emphasized our policy with them and had Arnon double-check that this was someone who contacted us initially, and was then routed to Russell as part of our search.

That being said, there are a lot of fish in the sea and I'm happy to not move forward with conversations with this particular individual if you prefer.

Thanks,  
Laszlo

---

**From:** Campbell, Bill [mailto:Bill\_Campbell@intuit.com]  
**Sent:** Tuesday, February 13, 2007 1:22 PM  
**To:** Laszlo Bock  
**Cc:** Shona Brown  
**Subject:** FW: Russell Reynolds Contact  
**Importance:** High

**Laszlo**

**Can we please not target Intuit.....**

**Bill**

---

**From:** Jason Hanold-Chicago [mailto:JHanold@RussellReynolds.com]  
**Sent:** Tuesday, February 13, 2007 12:20 PM  
**To:** [REDACTED]  
**Subject:** Russell Reynolds Contact  
**Importance:** High

Kind Regards,  
Jason

Jason Hanold  
Russell Reynolds Associates | Human Resources Practice  
200 South Wacker Drive | 29th Floor | Chicago, IL 60606  
Office 312.993.0702 | Mobile 312.316.3066 | [jhanold@russellreynolds.com](mailto:jhanold@russellreynolds.com) | [www.russellreynolds.com](http://www.russellreynolds.com)

This email may contain confidential information. If you are not the intended recipient, you should notify the sender and delete the email and any attachment. All emails sent and received by members of Russell Reynolds Associates are scanned for viruses and may be monitored centrally.

**Exhibit 42**



---

**From:** Stacy Sullivan <stacy@google.com> on behalf of Stacy Sullivan  
**Sent:** Tuesday, January 09, 2007 4:35 AM  
**To:** Laszlo Bock; Jonathan Rosenberg  
**Subject:** RE: FW: [Eng-announce] [Fwd: Q4 interviewing stats]

I'll talk with Andrea tomorrow on this. Cold calling into companies to recruit is to be expected unless they're on our "don't call" list. She and I just spoke today about helping her recruiting HR people and how much she needs helps. We couldn't be more supportive.

---

**From:** Laszlo Bock [mailto:laszlo@google.com]  
**Sent:** Monday, January 08, 2007 8:12 PM  
**To:** Jonathan Rosenberg; Stacy Savides Sullivan  
**Subject:** RE: FW: [Eng-announce] [Fwd: Q4 interviewing stats]

(DO NOT FORWARD)

No idea what she's talking about .... I personally screened and prioritized 1800 HR resumes last week to get more quality HR candidates in the pool and have said to get search firms working on these jobs. Stacy and I are both supportive of adding 7+ HR people to your org. That's the first part of your question ... Stacy, could you please look into this? I don't want Andrea feeling she's alone in this.

On the second part, HR hiring is going more slowly than it should because the HR staffing team is weak. The G&A staffing team leader, Gil Lawson, did the right thing (in coordination with me) and prioritized fixing Legal, Finance, and Admin hiring first, before turning to HR. It was more important to get the rest of the business running. That bottleneck is largely cleared now, and Gil plans to turn over 50% of the HR staffing team to upgrade. In the meantime, Stacy, Judy, I and the other Directors will be personally involved in prioritizing and screening candidates to get our pipeline up.

For extra credit, we've also retained Russell Reynolds to find 3 HR Directors -- one for Omid, one (likely) for Alan, and one for some combination of you/David/George. Stacy and I are discussing whether it makes sense to give Andrea a shot at leading HR for your org with a bigger team, or to have her rotate to another org when she's back from leave. Would be very interested in your perspective.

---

**From:** Jonathan Rosenberg [mailto:jonathan@google.com]  
**Sent:** Monday, January 08, 2007 6:06 PM  
**To:** Laszlo Bock; Stacy Savides Sullivan  
**Subject:** FW: FW: [Eng-announce] [Fwd: Q4 interviewing stats]

what is her poaching issue. Why isn't she hiring fast?

---

**From:** Andrea Ritzer [mailto:aritzer@google.com]  
**Sent:** Monday, January 08, 2007 6:01 PM  
**To:** Jonathan Rosenberg  
**Subject:** Re: FW: [Eng-announce] [Fwd: Q4 interviewing stats]

Until we do get PM HR staffed, it will be very challenging to add new initiatives w/o losing something out the other end.

I'm trying to be creative w/ recruiting from within the org as well as looking for seasoned people but we need to start poaching from other companies which is not something that we currently do. Stay on Laszlo on this- I will as well. We have to grow my team quickly or we will ultimately fail the Product folks and fall short of our

responsibilities to them.

On 1/8/07, **Jonathan Rosenberg** <[jonathan@google.com](mailto:jonathan@google.com)> wrote:  
how do we get you staff so all the things eng does, we do?

---

**From:** Urs Hoelzle [<mailto:urs@google.com>]  
**Sent:** Monday, January 08, 2007 4:40 PM  
**To:** [eng-announce@google.com](mailto:eng-announce@google.com)  
**Subject:** [Eng-announce] [Fwd: Q4 interviewing stats]

Here's an update to my email from Q4, with actual Q4 data plus some updates on what our plans are.

----- Original Message -----

Urs and Alan,









---

Eng-announce mailing list  
[Eng-announce@google.com](mailto:Eng-announce@google.com)  
<https://mailman.corp.google.com/mailman/listinfo/eng-announce>

**Exhibit 62**

**From:** EC  
**Sent:** Sunday, February 8, 2004 6:46 PM  
**To:** Rob Cook <rob@pixar.com>  
**Subject:** [REDACTED]

---

The key is to stay away from the engineers.

On Feb 8, 2004, at 3:41 PM, Rob Cook wrote:

> Hooray!  
>  
> I know this doesn't sound like a big deal, but sometimes it can be  
> surprisingly hard to find great support people, and we weren't  
> cherishing the thought of having to keep looking.  
>  
> Rob  
>  
>  
> Begin forwarded message:  
>  
>> From: Steve Jobs <sjobs@apple.com>  
>> Date: February 8, 2004 3:32:21 PM PST  
>> To: Rob Cook <rob@pixar.com>  
>> Subject: Re: Renee Adam  
>>  
>> Yea, its fine.  
>>  
>> Steve  
>>  
>>  
>>  
>> On Feb 8, 2004, at 3:30 PM, Rob Cook wrote:  
>>  
>> Steve,  
>>  
>> An Apple employee has applied for the job of project coordinator,  
>> which is basically an administrative assistant to our project  
>> managers. Since she's a support person instead of an engineer, I'm  
>> hoping this won't be a problem.  
>>

[REDACTED]

>> Would it be OK for us to make her an offer?

>>  
>> Rob  
>>  
>

**Exhibit 63**

**From:** Lori McAdams <lmcadams@pixar.com>  
**Sent:** Tuesday, December 11, 2007 9:50 PM  
**To:** jan.vandervoort@lucasfilm.com  
**Subject:** [REDACTED]  
**Attach:** Lucasfilm candidates.doc;ATT00686.htm

---

Hi Jan,

I hope this message finds you well. Funny that we went for so long without finding a reason to connect, and here it turns out I have a second item for you. At least this time I think it'll sound like good news to you.

We have a current intern, [REDACTED] who is interested in being considered for a position with Lucasfilm. [REDACTED] let his managers know that he'd need an okay from us to be hired at LFL. I wanted to let you know that of course it's fine with us for you to consider [REDACTED]. His specific situation is that he'll be finished with his work on our 2008 film in April, and unfortunately we don't have a regular fulltime position to offer him. With our full support, we hope he'll explore other studios and find a spot that's right. If you could please let your Associate Recruiter Rosie Server know we're okay with your considering him, that'd be great (I assume that's a real person and not an applicant bot! :-))

What I wanted to highlight in general is that it's okay for us to interview and make offers to each other's employees, we just don't ever directly solicit talent. So if someone applies to LFL on their own from Pixar, by all means you should consider them. We just have a courtesy call when the offer is made, and then we don't counter each other. The same is true in reverse. In case it's helpful, attached is a document I wrote up awhile back to help our team here know how it works. Feel free to read it and know that we know that LFL reciprocates.

If you have any questions, please give me a call. I hope we can meet in person in the new year. Thanks much,

--Lori


### **Lucasfilm candidate process**

Our gentleman's agreement with the Lucas companies has been as follows:

- When we receive a resume and/or reel from a current Lucasfilm employee, our Recruiting team reviews it and if we feel they are qualified for an open position, we contact the candidate, usually by phone. (Many of our Lucas candidates come through Pixar employee referrals since it's a small world here in Northern California.) HR/Recruiting never solicits Lucas employees ourselves.
- In that initial phone conversation, we let the candidate know that we will consider them, but if it should turn out that we want to make them an offer, they will need to notify their manager at Lucasfilm, and we will follow up with a phone call to Lucasfilm HR (or in some cases particular senior managers) to let them know we have made an offer to the candidate. We let the candidates know this up front because if they are apprehensive about this process, we don't want to waste their time or ours in interviewing them.
- If the candidate wishes to be considered, we then put them through our regular interview process and make a decision on whether or not we want to extend an offer.
- When an offer is made, we ask the Lucasfilm employee to notify their manager and then we follow up with a call to Lucasfilm HR (usually the HR Director) and/or in many cases, Colum Slevin, Dir. of CG at ILM (since most the candidates are from ILM), or Gail Currey at Lucasfilm Animation.
- Once we have had the conversation with LFL, we never counter if the candidate comes back to us with a better offer from Lucasfilm.
- Lucasfilm honors this process & agreement in return (the calls from LFL come to Lori)



Lori McAdams  
Vice President, Human Resources  
Pixar Animation Studios  
1200 Park Ave.  
Emeryville, CA 94608  
510-922-3564  
[lmcadams@pixar.com](mailto:lmcadams@pixar.com)



**Date:** December 11, 2007 4:42:41 PM PST  
**Subject:** lucasfilm hr contact info

\*Rosie Server\*  
Associate Recruiter

\*Lucasfilm\*  
P.O. Box 10037  
San Rafael, CA  
<<http://maps.google.com/maps?q=P.O.+Box+10037%2CSan+Rafael%2C+CA+94912-0037&hl=en>>94912-0037

\*Work:\* 415-662-1781  
\*Fax:\* 415-662-7831  
\*Email:\* [rosie.server@lucasfilm.com](mailto:rosie.server@lucasfilm.com) <<mailto:rosie.server@lucasfilm.com>>

**Exhibit 67**

**From:** EC  
**Sent:** Wednesday, February 18, 2004 1:19 AM  
**To:** Steve Jobs <sjobs@apple.com>  
**Subject:** Sony

---

Sony has approached all of our producers trying to hire them. They all just ignored Sony, although [REDACTED] forwarded on the email from the recruiter.

Today, [REDACTED], one of our department managers told me that she was offered a position as producer for Sony's first CG film and is likely to accept. If so, she would report to [REDACTED]

[REDACTED] was a very good department manager who some day will probably make the leap to producer, although [REDACTED] do not think that she is ready yet. She has not had any experience with any of the shot departments which is the bulk of production.

The director of the movie is [REDACTED] who started off as head of story on Monsters but burnt out. She is good but fragile. The movie is about animals that turn the table on hunters. [REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED] will talk with her. She isn't so great that we have to keep her, and she isn't so bad that she would hurt Sony.

We don't have a no raid arrangement with Sony. We have set up one with ILM and Dreamworks which has worked quite well. I probably should go down and meet [REDACTED] and Sony to reach some agreement. Our people are become really desirable and we need to nip this in the bud.

**Exhibit 68**

**From:** EC  
**Sent:** Sunday, February 8, 2004 6:46 PM  
**To:** Rob Cook <rob@pixar.com>  
**Subject:** [REDACTED]

---

The key is to stay away from the engineers.

On Feb 8, 2004, at 3:41 PM, Rob Cook wrote:

> Hooray!

>

> I know this doesn't sound like a big deal, but sometimes it can be

> surprisingly hard to find great support people, and we weren't

> cherishing the thought of having to keep looking.

>

> Rob

>

>

> Begin forwarded message:

>

>> From: Steve Jobs <sjobs@apple.com>

>> Date: February 8, 2004 3:32:21 PM PST

>> To: Rob Cook <rob@pixar.com>

>> Subject: Re: Renee Adam

>>

>> Yea, its fine.

>>

>> Steve

>>

>>

>>

>> On Feb 8, 2004, at 3:30 PM, Rob Cook wrote:

>>

>> Steve,

>>

>> An Apple employee has applied for the job of project coordinator,

>> which is basically an administrative assistant to our project

>> managers. Since she's a support person instead of an engineer, I'm

>> hoping this won't be a problem.

>>

>>

>>

>>

>> Would it be OK for us to make her an offer?

>>

>> Rob

>>

>